

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Michael L. Lansdale

Court File No. 016-cv-04106 JRT/BRT

Plaintiff,

v.

**DEFENDANT’S WITNESS LIST**

UPS Supply Chain Solutions, Inc.,

Defendant.

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Defendant UPS Supply Chain Solutions, Inc. (“UPS”) submits the following list of prospective witnesses:

**Angie Brewer**

55 Glenlake Parkway NE  
Atlanta, GA 30328

Ms. Brewer is the Human Resources Director for UPS who will testify about her involvement in the investigation of Mr. Lansdale’s corporate credit card use and expense reporting, and the decision to terminate his employment.

**Erica Chisholm**

12380 Morris Road N102  
Alpharetta, GA 30005

Ms. Chisholm is a Security Manager, Transportation for UPS who will provide foundation for evidence related to UPS policies and procedures as well as to UPS’ investigation of Mr. Lansdale’s corporate credit card use and expense reporting.

**Latisha Davenport**  
12380 Morris Road  
Alpharetta, GA 30005

Ms. Davenport is a Campus Security Specialist, CSC for UPS who will provide foundation for evidence related to UPS policies and procedures as well as to UPS's investigation of Mr. Lansdale's corporate credit card use and expense reporting.

**Robert Delaney**  
3025 Lunar Lane, Suite 100  
Eagan, MN 55121

Mr. Delaney is a Major Account Manager at UPS and will testify generally about UPS's policies and procedures, his involvement in UPS's investigation of Mr. Lansdale's corporate credit card use, the accuracy of Mr. Lansdale's expense reports, and UPS's investigation of Mr. Delaney's own corporate credit card use and expense reporting.

**Erika Faifer**  
500 Busse Road  
Elk Grove Village, IL 60007

Mr. Faifer is a Security Investigator who will testify generally about UPS policies and procedures, her involvement in UPS's investigation of Mr. Lansdale's corporate credit card use and expense reporting, the report of the investigation's findings to UPS management, and Mr. Lansdale's allegations of disability discrimination.

**Ryan Finney**  
12380 Morris Road  
Alpharetta, GA 30005  
(Based in Kentucky)

Mr. Finney is a Major Account Manager who will testify generally about UPS policies and procedures as well as to the accuracy of Mr. Lansdale's expense reports.

**Cris Florence**

660 Fritz Drive  
Coppell, TX 75019

Mr. Florence is a UPS Director of Sales and will testify about Mr. Lansdale's employment and work performance, UPS's policies and procedures regarding corporate credit card use and expense reporting, Mr. Lansdale's corporate credit card use and expense reporting, his involvement in UPS's investigation of Mr. Lansdale's corporate credit card use and the decision to terminate Mr. Lansdale's employment.

**Herman Gonzales**

660 Fritz Drive  
Coppell, TX 75019

Mr. Gonzales is a Supervisor in Human Resources at UPS who will testify about UPS's corporate credit card and expense reimbursement policies, his involvement in UPS's investigation of Mr. Lansdale's corporate credit card use and expense reporting, the report of the investigation's findings to UPS management, and Mr. Lansdale's allegations of disability discrimination.

**Rodney Helus**

55 Glenlake Parkway NE  
Atlanta, GA 30328

Ms. Helus is an Audit Manager, Corporate Compliance for UPS who will testify generally about UPS policies and procedures as well as UPS' investigation of Mr. Lansdale's corporate credit card use and expense reporting.

**Ron Jordan**

12380 Morris Road  
Alpharetta, GA 30005

Mr. Jordan is a Vice President of Sales, Global Freight Forwarding who will testify generally UPS's policies and procedures, his involvement in UPS's investigation of Mr. Lansdale's corporate credit card use and expense reporting, and the decision to terminate Mr. Lansdale's employment.

**Jeff LaMaster**

2200 Outer Loop, Suite 300  
Louisville, KY 40219

Mr. LaMaster is a Security Manager at UPS who will testify about UPS's corporate credit card and expense reimbursement policies, UPS investigation procedures, and his involvement in UPS's investigation of Mr. Lansdale's corporate credit card use.

**Michael Lansdale**

c/o Thomas Glennon, P.A.  
4900 IDS Center, 80 South Eighth Street  
Minneapolis, MN 55402

Mr. Lansdale will testify regarding his claims in this action.

**Elaine Penas**

10130 NW Prairie View Road  
Kansas City, MO 64153

Ms. Penas is an Ocean Freight Supervisor II, who will testify generally about UPS policies and procedures as well as to the accuracy of Mr. Lansdale's expense reports.

**Matt Scanlon (or other representative)**  
**US Group Consolidator Inc.**  
2975 Lone Oak Circle  
Eagan, MN 55121

Mr. Scanlon (or other representative of US Group Consolidator) will testify regarding Mr. Lansdale's employment with and separation from US Group.

**Lester Weekes**  
55 Glenlake Parkway NE  
Atlanta, GA 30328

Mr. Weekes is a Procurement Analyst at UPS, and he will testify generally about UPS corporate credit card and expense reimbursement policies and UPS's investigation of Mr. Lansdale's corporate credit card use and expense reporting.

**Brian Winter**  
1 Hog Island Road  
Air Cargo Building  
Philadelphia, PA 19153

Mr. Winter is a Major Account Manager who will testify generally about UPS policies and procedures as well as to the accuracy of Mr. Lansdale's expense reports.

Defendant reserves the right to call any witness identified in Plaintiff's witness list.

Defendant reserves the right to identify and call additional witnesses as it deems necessary to rebut evidence introduced by Plaintiff during his case-in-chief.

Defendant reserves the right to identify and call additional witnesses as it deems necessary to provide foundation for evidence objected to by Plaintiff.

Dated: December 3, 2018

**NILAN JOHNSON LEWIS PA**

By: s/ Sarah B. Riskin

Donald M. Lewis, Reg. No. 62844

Sarah B. Riskin, Reg. No. 0388870

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ATTORNEYS FOR DEFENDANT